

FY 2004 Massachusetts Community Development Block Grant Program

Infrastructure and Public Facilities GUIDE

October 2003



Mitt Romney, Governor
Kerry Healey, Lieutenant Governor
Jane Wallis Gumble, Director

INFRASTRUCTURE AND PUBLIC FACILITIES WITH CDBG

Many communities seek Massachusetts Community Development Block Grant (CDBG) funds for public facility and infrastructure projects because they have limited capital budgets and cannot afford all of the public improvements their residents need. The Mass. CDBG Community Development Fund I and II can finance special projects and neighborhood improvements that might otherwise have to wait several years for “their turn”.

For the purposes of this document, “public facilities” and “infrastructure” are separated because they usually require different ways of demonstrating that a national objective can be met, and they often involve different implementation plans. As used below, “public facility” means buildings or structures that are publicly or privately owned *and* which are used by persons seeking access to services provided by or available in the facility. “Infrastructure” means public improvements at street level or below grade, the effects of which are felt throughout an entire area.

Some examples of public facility projects that can be assisted with CDBG funds include:

- Senior centers
- Social service centers
- Homeless shelters
- Neighborhood playground improvements
- Solid waste transfer and recycling centers
- Renovating closed school buildings for a CDBG-eligible use
- Removing architectural barriers from existing public buildings.¹

In contrast, examples of infrastructure projects include:

- Street and sidewalk repairs and related “streetscape” improvements
- Installation or upgrades of water mains, sanitary and storm sewer systems
- Construction of or improvements to parking lots.

It is important that applicants make these distinctions when choosing a Project Packet for inclusion in the current year’s Mass. CDBG proposals. The application includes a chart that explains how to select the correct Project Packet for all CDBG-eligible activities. If, after

¹ Mass. CDBG has a training document, “Achieving Accessibility with CDBG.” Reference this material if undertaking accessibility improvements.

consulting the chart, you still have questions about which packet is appropriate, you should contact Mass. CDBG staff and seek clarification.

Eligibility

Infrastructure and Public Facilities are eligible for CDBG assistance under the Title I of the Housing and Community Development Act of 1974, the statutory umbrella of HUD's Community Development Block Grant Program. At Section 105(a) of Title I, there is a list of all CDBG-eligible activities. They are also enumerated in Appendix A of the 2003 Application Package; Chart II of the application provides a listing of activities and projects. To help applicants understand the difference between these provisions, below is a list of the public facility or infrastructure-related activities from Title I and some specific examples of the kinds of projects that can be carried out under each are presented below.

Section 105(a)(2): Acquisition, construction, reconstruction or installation of public works and facilities, except for buildings for the general conduct of government, and site or other improvements.

Examples:

- Acquisition of water mains once owned by a fire and water district, in order to upgrade service to a given area or lower the cost of debt service paid by property owners connected to the system
- Installation of storm sewers to reduce the burden on an existing public wastewater disposal system
- Reconstruction of deteriorated streets and sidewalks and installation of new street lights
- Rehabilitation of a public building for use as a senior center
- Acquisition and rehabilitation by a non-profit organization of a building to be used as a multi-service center for low- and moderate-income persons
- CDBG assistance to install new utilities (electrical, water, sewer, on-site septic system) for a building that will be used as a neighborhood service center

Section 105(a)(7): Disposition (through sale, lease, donation or otherwise) of any real property acquired pursuant to this title, or its retention for public purposes.

Examples:

- Sale of a CDBG-acquired and rehabilitated building to a non-profit organization that provides public services to low- and moderate-income persons (where proceeds from the sale are CDBG program income)

- Sale of a CDBG-acquired vacant site to a non-profit development corporation or a housing authority that is building new affordable housing (where proceeds from the sale and transfer are CDBG program income)
- Execution of a long-term lease with an organization that will use a CDBG-financed public building to provide job training and other support services for low- and moderate-income persons (where lease payments are also CDBG program income)

Space allocation plans

Projects involving publicly owned, multi-use buildings should include a space allocation plan that details CDBG-eligible and non-eligible town (general government) functions. **It must be clear that the portion of the building developed for non-eligible uses will not be financed with CDBG funds.** For example, a proposal to expand a municipal center by 1,500 square feet, with 1,000 for social service activities and 500 square feet for municipal office use may use CDBG funds only on the eligible 1,000 square foot area. Furthermore, there must be evidence that upon completion, the expansion will be occupied and exclusively used by organizations that serve low- and moderate-income persons.

Common systems such as HVAC or kitchen facilities must also be pro-rated allowing payment with federal funds for only eligible project space. To determine the share that can be financed by CDBG, the allocation plan must be based on the proportionate number of users who are CDBG beneficiaries to those who are not. For example, if a community is adding a wing to Town Hall for the sole purpose of providing a senior center, and the project includes a kitchen to serve the entire building, the applicant must determine how many senior citizens will benefit from the kitchen and how many non-senior residents and/or staff will benefit from it as well. If over the course of a year, 500 seniors will use the new center and have access to the kitchen for meal preparation, and 500 community-wide residents will also use the kitchen for community purposes, then CDBG can pay up to one-half the cost of installing and equipping the kitchen.

National Objective

The National Objective for infrastructure and public facility projects is most often “benefit to low- and moderate-income persons.” To understand how infrastructure and public facilities differ in concept, some simple national objective rules of thumb should help. When providing a benefit to low- and moderate-income persons, characteristics of the individual users and potential users are evaluated. The method of demonstrating low- and moderate-income benefit for a public facility project usually involves one of the Limited Clientele Benefit methods available in the HUD regulations:

1. The facility assists persons generally presumed by HUD to be principally low- and moderate-income. HUD has designated six categories of people presumed² to be low-

² HUD accepts these presumptions unless there is evidence to the contrary. Appendix D of the Mass. CDBG application is a listing of communities that have fewer than 51% of elderly residents that are low- or moderate-income, DHCD will not accept

and moderate-income: severely disabled adults, elderly, battered spouses, abused children, illiterate persons, and migrant workers. The rehabilitation or construction of a social service center or senior center often provides services to this limited clientele.

2. The assisted facility activity serves a population that has income eligibility requirements, which limit the activity exclusively to low- and moderate-income persons (e.g., improvements to a playground located in a subsidized housing development for the exclusive use of its residents). No verification of income is required.
3. The assisted facility activity is of such a nature and in such a location that it can be concluded that the activity's clientele will be primarily low- and moderate-income persons (e.g., a soup kitchen or homeless shelter). No verification of income is required.
4. The beneficiaries of the assisted facility are at least 51% low- and moderate-income. Low- and moderate-income status is determined by income documentation or as dictated by local program design.

It is possible to show that a public facility benefits an area with 51% or more low- and moderate-income residents. However, the applicant must demonstrate that the low-income area is in fact the project's *geographic service area*. The mere fact that a building is located in a predominantly low-income neighborhood does not mean that the benefits of improving it are principally confined to that area. Communities planning to use an area-wide benefit approach need to establish who uses the facility in order to make a case that the surrounding area will benefit (e.g., the users must be residents of the target area and the target area must have 51% or more low- and moderate-income residents).

Special Public Facilities Rule for State CDBG Program Recipients

HUD requires recipients of State CDBG Program grants to retain the use for which CDBG funds were expended on behalf of a public facility project for a minimum of five years. The purpose of this rule [24 CFR Part 570.489(j)] is to ensure a long-term low- and moderate-income benefit from the use of federal funds. This means a community cannot receive CDBG funds to rehabilitate a former school building for use as a senior center, and then convert the facility to a town hall three years later.

If retaining the approved use for five years becomes impractical, a community can ask Mass. CDBG for permission to change the use. However, the new use must also benefit low- and moderate-income persons and a plan for complying with the national objective is an integral part

the elderly presumption of low- and moderate-income. A statistically reliable survey must be presented to demonstrate that the [potential] users are low- or moderate-income. For senior center proposals, grantees will be required to demonstrate that the users are predominantly low- and moderate-income for a five-year period.

of any use conversion. A change of use that no longer achieves a national objective can result in the need to repay grant funds to Mass. CDBG. Communities planning to apply for public facility projects need to consider the feasibility of meeting this requirement.

When *infrastructure* provides a low- and moderate-income benefit, it is almost always designed to do so on an area-wide basis. The area benefit strategy requires grant applicants to prove, with census or other survey data, that a majority of the beneficiaries of the project will be low- and moderate-income persons. The benefit to them does not result from their choice to use a facility or the services it provides, but because they live on the street being reconstructed, or live in a structure that will be hooked up to a new public water line. These persons share with others the advantages of an infrastructure project such that benefit is measured in relation to the aggregate: if more than 51% of the beneficiaries are low- and moderate-income, the project will generally qualify.³

Infrastructure may also meet the low- and moderate-income benefit test as a job **creation or retention activity if the assistance primarily serves for-profit businesses. Communities considering the development or improvement of infrastructure necessary to support economic development should consult Mass. CDBG staff because there are special rules that apply.**

Finally, another way of providing low- and moderate-income benefits through infrastructure improvements is by eliminating accessibility barriers. A project that is limited to curb cuts, ramps and appropriate signage in order to remove access barriers for the elderly and severely disabled adults would meet the national objective as a special project that benefits these populations, both of which are presumed low- and moderate-income by HUD.

Prevention or Elimination of Slum and Blighting Conditions may also be used under certain circumstances. The national objective of preventing or eliminating slums and blight may be chosen for public facility and infrastructure projects on an *area* basis, and public facility projects involving buildings could also meet this national objective on a *spot* basis.

Prevention or elimination of slums and blight on an area-wide basis. This national objective may be used for any activity designed to eliminate or prevent slums or blight on an area basis including streetscape improvements. All of the following points must be documented in the grant application:

- The Community must determine that the area meets the state's definition of deteriorated, substandard, blighted or decadent areas as stated in MGL ch.121A and ch.121B.
- In addition, communities must also document that: "Throughout the area there is a substantial number of deteriorated or deteriorating buildings or the public improvements are in a general state of deterioration". DHCD and HUD have determined that at least 25% of the

³Please refer to the document in this series entitled, "Documenting National Objective Compliance in Area-Wide Benefit Activities," for further guidance.

buildings in a target area be deteriorated or deteriorating (receiving a rating of fair or poor on the inventory).

- Applicants seeking to qualify projects under slums and blight based solely on deterioration of public improvements must document that the public improvements throughout the area are in a general state of deterioration. Deterioration of a single element of infrastructure such as a road or a sidewalk does not meet this criterion.
- An inventory of the substandard conditions that qualify the area as blighted must be developed as part of application development and maintained during grant implementation. The inventory will become a yardstick for the program's achievements, as well as its compliance with national objective. Specific information on conducting a slums and blight inventory is included on page 10. Applicants planning infrastructure improvements must include information showing that the condition of the infrastructure contributed to the deterioration of the area. The inventory link between existing conditions and the specific projects undertaken to address the conditions is key to the documentation requirements for demonstrating compliance with the national objective selected.
- To meet federal regulations, the assisted project/activity must address one or more of the conditions that contributed to the deterioration of the area. In accordance with DHCD policy, a project that most directly addresses the elimination of deteriorated/blighted conditions identified in an inventory for a target area will have a scoring advantage over those that merely address prevention of blight.

Prevention or elimination of slums or blight on a spot basis. It is important to remember that eliminating blight on a spot basis can be used only if the project *area* is not blighted and if the scope of work is limited to "the extent necessary to eliminate specific conditions detrimental to public health and safety." Eligible projects for eliminating blight on a spot basis are limited to acquisition, clearance, demolition, relocation, historic preservation and building rehabilitation.

Critical Community Need is extremely difficult to prove because of stringent regulatory requirements. Communities planning to show that a public facility or infrastructure project will address an urgent or critical local need must receive prior Mass. CDBG approval to cite this as the national objective for any project.

Initial Planning Steps for Construction Projects

1. Evaluate the construction or rehabilitation needs in your community. Determine what problems need to be addressed or evaluated. The application needs to explain why the proposed infrastructure or public facility project was chosen, given the range of needs in the community.
2. Set funding priorities and identify all possible funding resources. Bonding, tax overrides or tax debt exclusion should be considered for infrastructure projects. In cities and towns with a high tax levy per capita, Proposition 2-1/2 overrides may be impractical if not

inappropriate. Consider and weigh the full range of funding sources available and discuss them in the grant application. Show that CDBG funds are necessary to complete the proposed projects.

3. Establishing a building committee and soliciting input from community groups will also help an application in the areas regarding citizen participation and how your community selected a project for CDBG's consideration. Many towns have a Town Buildings Committee instead of individual building committees for public facility projects. Mass. CDBG encourages you to avoid duplicating existing volunteer efforts, but you might ask your Town Buildings Committee to add a small group of additional members who would work as a subcommittee on a CDBG-assisted project. This would help ensure that citizen beneficiaries have a voice in the project planning process.
4. Hold a public meeting to discuss options and priorities, and involve people affected by the project, mention the two required public hearings, and have one prior to application submittal, and one during program implementation.
5. As a rule, the more pre-application design work that has been completed, the more competitive your application will probably be. This is because a building project that has gone through design development is more likely to have a realistic, line item budget than one that is based on schematic or master plan-level studies. Furthermore, a project that is ready for detailed construction plans and specifications will go out for construction bids more quickly, and is more likely to be finished within the eighteen-month schedule of a one-year grant.

Program Design Considerations

The design of an infrastructure or public facility project should provide all information requested in the Application, and, at a minimum, address the following set of issues:

- Communities must explicitly state how their projects will be funded and cite and document availability of all other funds required. The project must be ready to begin without significant delays. Proposed projects may be eliminated from consideration if they lack documentation of matching funds based on feasibility, may lose points on competitiveness for Community Development Fund I or II.⁴

Note: in federal FY 2004, the Community Development Fund I and II, and Ready Resource Fund do not require cash or in-kind matches for any public facility or infrastructure projects. Thus, a match is not an eligibility threshold. However, applications will be more competitive where communities can document that they have solicited other funding sources and leveraged cash or in-kind services.

- Provide specific information about the improvements for which you are seeking CDBG funds, including linear, square, or cubic feet of construction: (e.g., 2,000 linear feet of

⁴See, for example, Application Package questions on Readiness to Proceed and Activity Budget.

waterline to be installed; construct a public facility center with 2,500 square feet for elderly services; 7,000 cubic yards of loam and 25 aspen trees installed in a neighborhood park; construct a recycling plant to handle 8,000 tons of the participating communities' paper, glass and cans; pave deteriorated roads (10,000 linear feet) with 50,000 cubic yards of black top; install 1,000 linear feet of new 21-inch PVC sewer line).

- Consider the following when developing an implementation plan:
 1. Who will oversee the project, including procurement, design, bidding and construction?
 2. Who will be responsible for labor standards compliance (in particular, wage rate monitoring)?
 3. Who will prepare design plans: the municipality or a consultant? Who is responsible for procuring consultant services?
 4. Who provides labor: the municipality, through its public works department (forced account labor), or a general contractor selected through a competitive bid process?
 5. If project labor is contracted from private sources, federal labor standards compliance must be built into project design. Federal and/or state wages need to be accounted for in the labor budget. If the project is being carried out by a non-profit entity and the town is not executing construction contracts as a public awarding authority, then federal prevailing wage rates will govern the cost of labor. However, in most cases construction work on these projects is procured and contracted by the municipality. In these instances, you must obtain both the federal and state prevailing wage schedules for the labor classifications that will be deployed on the project, and the contractor must pay the higher of the two for each job classification.
 6. Federal wages are triggered for construction contracts that exceed \$2,000, regardless of the total amount of CDBG assistance. Certain categories are exempt, such as legal, clerk of works, self-employed contractors, foremen, and apprentices. Prevailing wages can increase labor costs by as much as 25%, so you must account for potential project cost impacts when calculating your construction budget.
 7. Work on public buildings is also subject to state regulations, governing procurement, and prevailing wages. Consult with your Town Counsel or City Solicitor, your Town Buildings Committee, Town Manager or other available officials to determine which of the state procurement rules apply to the type of project you plan to propose in your application. All procurement, regardless of dollar amount, must be conducted in a manner that provides for maximum free and open competition.
 8. Site control may be important in certain projects (a threshold requirement for any senior center project). In the grant application, communities should state who owns or has an interest in the property to be improved with CDBG funds. There must also be a long-term maintenance plan for the project so that funds are not used for public facility

improvements that cannot be properly maintained in the long run. Describe the plan in the context of your community's existing public facility or infrastructure maintenance programs.

9. Implementation schedules must be realistic; consider start-up date, seasonal weather, design time, and permits to obtain. The schedule must account for all design, permitting, and construction activities required to complete a project. Weather and seasons should be considered. Communities must complete a one-year grant project within the eighteen-month grant period.
10. The construction process generally includes these primary steps:
 - Procurement and award to the designer/other service
 - Design or engineering phase(s)
 - Preparation of plans, specifications and bid documents
 - Construction bidding
 - Contract award
 - Pre-construction conference
 - Construction phase - labor standards/wage and payroll monitoring
 - Inspections to pay invoices
 - Final inspections and contract monitoring
 - Retainage held - final retainage released
 - Close-out.

All of these functions need to be addressed in your grant application's implementation plan so Mass. CDBG can determine whether the project is feasible.

Projects in a Downtown or Neighborhood Commercial Area

Downtown-related projects are generally those that use CDBG funds in support of a commercial area revitalization strategy or plan. They do not include functions traditionally carried out by municipalities on public property, such as street and sidewalk improvements, which are carried out as infrastructure or public facility projects. Should you have any questions regarding the classification of a project as a traditional municipal function or a downtown-related activity seek Mass. CDBG technical assistance.

Communities that plan to apply the Community Development Fund for “downtown-related projects” must have a downtown or commercial area revitalization element in their community development strategy.

In addition many communities that have been successful with downtown revitalization have established a Downtown Organization. These organizations may take several forms. Some examples are:

- an independent downtown organization which is a stand-alone organization with the single objective of downtown revitalization,
- a public organization which consists of a town task force, town committees or a committee under the redevelopment authority which has at least one year of experience with downtown revitalization activities, or
- private organizations whose overall mission statements include downtown revitalization, such as Chamber of Commerce affiliates, community development corporations and historic organizations.

Slum and Blight Documentation Inventory

As noted above, several criteria must be met for an activity to meet the national objective of elimination or prevention of slums and blight. One of the criteria requires documentation that throughout the area there are a substantial number of deteriorated or deteriorating buildings or public improvements or both. Applications that do not demonstrate such deterioration will be eliminated from funding consideration. The documentation necessary to meet this requirement of the national objective consists of a slums and blight inventory that must include the following information:

For buildings in target area the following information is required:

- The nature of the existing cosmetic or structural deterioration for each building identified as deteriorated * (see next page).

- The percentage of buildings that are deteriorated in the area as a whole. At least 25% of the buildings in the target area must be rated as poor or fair, when using the rating criteria described on the following page, or similar criteria.
- A description of the level of disinvestments that has contributed to the deterioration of the area. This description should include an indication of the extent of building vacancies. Other conditions cited by grantees include: tenants relocating to a new mall or office space, lack of lighting or use of the area in the evening contributes to residents' reluctance to patronize the businesses, unwillingness of landlords to correct code violations, etc.

For public improvements in the target area the following information is required:

- Describe and quantify the deterioration for each type of public improvement identified, e.g., linear feet of sidewalks, roadways, and numbers of light fixtures. Public works officials can be helpful in the preparation of this facet of the slums and blight inventory.

Note: Projects seeking to qualify under slum and blight based solely on deterioration of public improvements must document that the public improvements throughout the area are in a general state of deterioration. Deterioration of a single element of infrastructure, such as a road or a sidewalk, does not meet this criterion.

A map must be provided showing:

- The geographic area designated as slum and blighted. (An assessor's parcel map is recommended for the slums and blight inventory map.)
- All buildings and public improvements that have been identified as deteriorated. (A method for showing deteriorated buildings and public improvements is to highlight these sites in color).
- An attachment that describes the nature of the cosmetic or structural deterioration for each building and public improvement identified along with supportive photographs.
 - * Consistency in describing the conditions, area and buildings is important because the inventory will be used for documentation of meeting a national objective, as well as a gauge of addressing the slum or blighting conditions of the area in future funding years. Once DHCD determines that a target area meets the National Objective criteria for slum and blight on an area basis, that designation for that defined area shall be valid for a period of five years from the date of such determination.

Rating criteria for buildings and public improvements

For buildings and infrastructure, the community must utilize standard rating scale for measuring physical conditions in the target area. A common method used to evaluate conditions is a

windshield survey (the name “windshield” derived from surveying buildings and infrastructure from the inside of a vehicle). For the exterior of the building a checklist can be used to rate the major components (roof, foundation, siding etc.) as well as cosmetic components of a structure. Infrastructure components should be evaluated in the same manner. A numerical score can be assigned to the condition of the component based upon a poor to excellent scale. Structural elements/code violations should be weighted substantially higher than cosmetic elements. The scores for each component are compiled to arrive at a total score for the building or infrastructure element. The highest score signifies a building or infrastructure element in excellent condition while the lowest score results in a building or infrastructure element in poor condition. A local building inspector, tax assessor and public works director can be helpful in the design of this survey. Communities should use the Categories of physical condition below as a guide in the completion of the inventory.

Definitions for Categories of Physical Condition

Excellent: Buildings that require little or no exterior or interior work. Buildings are in excellent condition and may be of any age or style. They demonstrate consistent, planned maintenance and repair, systems meet code and building is energy efficient. In addition, this category includes infrastructure (streets, sidewalks, bridges, lighting, etc.) that is newer, meets current need and demand, is compliant with all state and federal codes and requirements and has no visual or physical evidence of deterioration or needed repair.

Good: This category covers buildings, infrastructure, and structures that are now showing the first signs of deterioration. Roofs may be aging but not yet leaking. Siding may need spot painting or repair. Building systems meet code by energy efficiency such as storm windows may be needed. Decorative features may need to be secured but items are in place. Materials do not need replacement but do need some care and repair.

Fair: Buildings, structures, and infrastructure with this designation show clear signs of deterioration indicative of a property or infrastructure that has not been maintained for 5 to 10 years. These may have at least 25% of their painted surfaces in a progressed state of peeling. In the case of brick surfaces, 25% of the surface requires repointing. Infrastructure is older and needs regular repairing. Streets and sidewalks are cracked, uneven and do not insure easy and safe pedestrian travel. Small wood and metal trim pieces of buildings or structures may be lifting away from primary surfaces. Exterior trim is no less than 50% intact. This category may have older facades with architectural features that have been covered with sheet metal and other like materials from renovations of earlier decades. These covering materials are now showing signs of significant deterioration. Roofing materials may be missing. Windows need to be re-conditioned for energy efficiency. Plaster/wallboard may be stained from leaks, but is still in place.

Poor: This category includes properties and infrastructure that appear not to have been maintained for at least 10 years. Facades are likely to have missing and broken siding, bricks, or

masonry surfaces. At least 50% of the painted surfaces may show signs of advanced peeling. Exterior trim is missing altogether. Roof may be actively leaking. Systems are inadequate or are in poor repair. Building foundation and sills may need replacement and shoring up. Structural work may be necessary. Streets/sidewalks and other paved surfaces are rutted, cracked and appear to require full reconstruction. Little, if any “reveal” remains on the curbing. Crosswalks and sidewalks are not accessible. Some surfaces are severely deteriorated and in general infrastructure is antiquated, undersized, or obsolete.

The form (Exhibit I) on the next page is one way of presenting the information for a slum and blight inventory.

S:\WP\2004 CDBG\Tech Assist\2004CDBG Infrastructure TA Guide.DOC

Exhibit I

Base-line Information Form for CDBG activities to prevent or eliminate conditions of slums or blight: Area Basis			
Documentation category	Specific Item	Numerical Response (# or %)	Identify on Target Area Map?
Total acreage of target area:			
Land uses as % total land area: <i>Estimate the percentage of the total target area by listed item.</i>	Commercial		
	Industrial		
	Residential		
	Transportation (roads)		
	Open Space		
	Public/Institutional & Other		
Distribution of buildings: <i>Indicate how many of the buildings are commercial, industrial, residential or public in the target area.</i>	Estimate # Commercial buildings		
	# Industrial buildings		
	# Residential buildings		
	# other buildings (Public/Institutional, & other)		
Building Condition Determination:	# Total Buildings in Target Area # Total Buildings Fair and Poor % Total Buildings Fair and Poor		
<i>Rank the # of Commercial buildings by condition</i>	# in Excellent Condition # in Good Condition # in Fair Condition # in Poor Condition		yes
<i>Rank the # of Industrial buildings by condition</i>	# in Excellent Condition # in Good Condition # in Fair Condition # in Poor Condition		yes
<i>Rank the # of Residential buildings by condition</i>	# in Excellent Condition # in Good Condition # in Fair Condition # in Poor Condition		yes
<i>Rank the # of Public/Institutional buildings by condition</i>	# in Excellent Condition # in Good Condition # in Fair Condition # in Poor Condition		Yes

Documentation category	Specific Item	# or % Response	Identify on Map?
Roads	Total linear feet of roads		
	Total linear feet in deterioration		yes
	<i>Attach narrative indicating whether cosmetic or structural deterioration</i>		
Sidewalks	Total linear feet of sidewalks		
	Total linear feet of sidewalks in deterioration		yes
	<i>Attach narrative Indicating whether cosmetic or structural deterioration</i>		
Parking: Public or Private	# Parking areas, public or private		
	# Parking areas in deterioration		yes
	<i>Attach narrative indicating whether cosmetic or structural deterioration</i>		
Parks, Playgrounds or vacant, open space areas	# parks, playgrounds, open spaces		
	# parks, playgrounds, open spaces in deterioration		yes
	<i>Attach narrative indicating types of deterioration</i>		
Other public improvements: <i>Examples: sewer lines, lighting, landscape. List total amount; Estimate # or % in deterioration.</i>	List public improvement Total # Total % in deterioration		yes
	<i>Attach narrative indicating type of deterioration</i>		
Vacancy and indicators of disinvestment	% vacant commercial units		
	% vacant industrial units		
	# vacant residential units		
	# boarded up, abandoned, condemned or foreclosed buildings		yes
Historic Resources	buildings on or eligible for listing on National Register		yes
Basic business data:	Estimate # of Businesses operating in the target area		
	Estimate # of Businesses that have left target area in the last 24 months		
	Estimate # of Business that have come into the target area in the last 24 months		